

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**Re: D.I. 541**

**NOTICE OF WITHDRAWAL OF THE FIFTH AVENUE LANDLORD’S MOTION TO  
COMPEL IMMEDIATE PAYMENT OF STUB RENT IN ACCORDANCE WITH  
BANKRUPTCY CODE § 503(b) WITHOUT PREJUDICE**

Fifth/Grand Holdings, LLC (the “Fifth Avenue Landlord”) withdraws, without prejudice, the *Fifth Avenue Landlord’s Motion to Compel Immediate Payment of Stub Rent in Accordance with Bankruptcy Code §503(b)* (D.I. 541).

The Fifth Avenue Landlord reserves all rights, claims, and interests with respect to Lease, the Fifth Avenue Store, and any related matters (including, without limitation, all rights under 11 U.S.C. §§ 365(b), 365(d)(3) and 503(b) and applicable law).

---

<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores – PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores – CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Dated: November 19, 2024  
Wilmington, DE 19801

**ESBROOK P.C.**

/s/ Scott J. Leonhardt  
Scott J. Leonhardt (DE 4885)  
1000 N. West Street  
Suite 1200  
Wilmington, DE 19801  
(Phone) 302.650.7540  
E-Mail: [scott.leonhardt@esbrook.com](mailto:scott.leonhardt@esbrook.com)

and

Robert B. Berner (0020055)  
Bailey Cavalieri LLC  
409 E. Monument Ave., Suite 103  
Dayton, Ohio 45402  
(Phone) 937.223.4701 / (Fax) 937.223.0170  
E-Mail: [rberner@baileycav.com](mailto:rberner@baileycav.com)  
Counsel for Fifth/Grand Holdings, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Notice of Withdrawal of Fifth Avenue Landlord's Motion to Compel Immediate Payment of Stub Rent in Accordance with Bankruptcy Code § 503(b) Without Prejudice* was served electronically on the date of filing, through the Court's ECF System on all ECF participants registered in the case at the email address registered with the Court.

**ESBROOK P.C.**

/s/ Scott J. Leonhardt  
Scott J. Leonhardt (DE 4885)  
1000 N. West Street  
Suite 1200  
Wilmington, DE 19801  
(Phone) 302.650.7540  
E-Mail: [scott.leonhardt@esbrook.com](mailto:scott.leonhardt@esbrook.com)

and

Robert B. Berner (0020055)  
Bailey Cavalieri LLC  
409 E. Monument Ave., Suite 103  
Dayton, Ohio 45402  
(Phone) 937.223.4701 / (Fax) 937.223.0170  
E-Mail: [rberner@baileycav.com](mailto:rberner@baileycav.com)  
Counsel for Fifth/Grand (Med-Pro), LLC, Fifth/Grand (CCFI), LLC, Fifth/Grand (Echo/Columbus), LLC, and Fifth/Grand (Solihull), LLC